

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

4. Defendant, Mason Mabry, Rikley Ameri, Shavonna Planer, ^{michelle Fvey} is
(name, badge number if known)

☒ an officer or official employed by Jesse Brown Veterans;
(department or agency of government)
Hospital 820 South Damen Chicago, IL 60612 or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is VA employees- all defendants. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if

custom or policy allegations are made at paragraph 7 below.

6. On or about 1-2019-7-2020 12-8-2020, 10-30-2020 at approximately 8AM-5PM ☒ a.m. ☒ p.m.
(month, day, year)
plaintiff was present in the municipality (or unincorporated area) of Jesse Brown Veterans Hospital, in the County of Cook,
State of Illinois, at 820 South Damen Chicago, IL 60612,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☒ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☒ Other:

All of the above VA employees have breached my privacy medical records and HIPPA violations. And allegedly stolen my earned veterans travel pay benefits for my scheduled doctors appointment for October 2020 and November 2020

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[If you need additional space for ANY section, please attach an additional sheet and reference that section.] The mentioned VA employees have also destroyed my personal health and financial records and forms I completed and gave to Jesse Brown VA Hospital on 1-20-20.

7. Defendant officer or official acted pursuant to a custom or policy of defendant

municipality, county or township, which custom or policy is the following: (Leave blank

if no custom or policy is alleged): There VA employees have allegedly

violated HIPAA Laws, Violated Veterans Travel Pay benefits and policies, commenced discriminatory acts,

abuse of powers, committed perjury, fraud, falsified veterans

8. Plaintiff was charged with one or more crimes, specifically: healthcare and financial record documents.

9. (Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other") The criminal proceedings

☐ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹

☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____

☐ Other: _____

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

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10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

On 12-8-20 Mason Mabrito called me - T Lemay Plaintiff and stated he and other mentioned VA employees destroyed - discarded my completed medical - financial records and, as a result he was withholding my travel pay which is owed to me for the months of October 2020 and November 2020. Mr. Mabrito has allegedly "thef + by taking" stole money owed to me from the Dept. of Veterans Affairs Jesse Brown VA Hospital. Also Mabrito, R. Ament, Shavonna Planer, and Michelle Evey have allegedly breached and violated HIPPA Patient Privacy by allowing JBVA-Hospital employees - L. Larocco, C. Begles, and C. Ashdown invade and delete/destroy my health care information.

11. Defendant acted knowingly, intentionally, willfully and maliciously. ☒ Yes on a secured veteran network called my health vet.gov.

12. As a result of defendant's conduct, plaintiff was injured as follows:
For 2 1/2 years I've suffered enormous amount of stress. Lost 5 monetary Veterans monies owed to me. I've been denied health care that I'm entitled to. I keep spending long hours trying to correct above VA employees mistakes. And above VA employees keep committing same crimes without any conscious or disciplinary actions against the m.

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

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14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint. yes

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Tamara Lemay

Plaintiff's name (print clearly or type): Tamara Lemay

Plaintiff's mailing address: 18446 Cowing Ct

City Homewood

State IL

ZIP

60430

Plaintiff's telephone number: (708) 927-2811

Plaintiff's email address (if you prefer to be contacted by email): _____

15. Plaintiff has previously filed a case in this district. ☐ Yes ☒ No

If yes, please list the cases below.

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.